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REMARKS

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Applicant asserts that the present invention is new, non-obvious and useful. Favorable reconsideration and allowance of the application are respectfully requested.

Status of Claims

Claims 1, 7, 11, 14, 15, 18, 23 and 31-34 are pending in the application. Claims 1, 7, 15 and 32 have been amended.

Applicant respectfully asserts that the amendments to the claims add no new matter.

CLAIM REJECTIONS

35 U.S.C. § 102 Rejections

Claims 1, 7, 14, 15, 18, 23 and 32 have been rejected under 35 USC §102(e) as being anticipated by Whitehill et al., U.S. Publication Number 2004/0028017 A1 (hereinafter Whitehill). Specifically, with regard to claim 7, the Examiner contended that Whitehill discloses a method, comprising: using location fingerprint to determine a location of said client (p. 3 [0035, lines 15-18] and p. 2 [0017], lines 2-10).

As is well established, in order to successfully assert a prima facie case of anticipation, the Examiner must provide a single prior art document that teaches every element and limitation of the claim or claims being rejected.

Each one of amended independent claims 1, 15 and 32 recite, in paraphrase, determining a location of a client based on a location fingerprint of a signal received from said client.

It is respectfully asserted that Whitehill does not teach or fairly suggests at least this feature of the claimed invention.

Applicant respectfully asserts that Whitehill describes locating a client using range measurements taken from trusted infrastructure devices whose physical location is known (page 2, par. [0017], lines 3-8). Furthermore, Whitehill describes locating a client by

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measuring a distance at which the requesting node is located from a fixed device (p. 3, par. [0035], lines 15-17).

A method for locating a client using a location fingerprint as claimed in (amended) independent claims 1, 15 and 32 by Applicant is implemented by determining signal characteristics such as, for example, multipath signals as is supported in the Applicant's specification, page 6, paragraph [0015]. Multipath characteristics are clearly defined in the art as a propagation phenomenon that results in radio signals' reaching a receiving antenna by two or more paths because the signal is reflected off buildings or other obstructions. As a consequence, Applicant's (amended) independent claims 1, 15 and 32 teach a method of locating a client according to, for example, the number of paths of the signal reaching at the receiving antenna from the client.

Whitehill fails to teach all elements of claims 1, 15 and 32, at least because Whitehill does not teach locating a client using location fingerprint according to, for example, the number of paths of the signal reaching at the receiving antenna but according to range measurements and/or distances of the client.

Thus, it is respectfully requested that the rejection of independent claims 1, 15 and 32 under 35 U.S.C. 102§(e) in view of Whitehill be withdrawn.

Furthermore, it is respectfully submitted that independent claims 1, 15 and 32 are patentable, and thus allowable, over the prior art references on record and any combination thereof. In this regard, it is noted that the distinguishing features of independent claims 1, 15 and 32 as discussed above, would not have been obvious at the time the invention was made to a person skilled in the art, in view of Whitehill, alone or in combination with any other cited references.

Claims 7 and 14 depend directly from independent claim 1 and incorporate all the elements of this claim. Claims 18 and 23 depend directly from independent claim 15 and incorporate all the elements of this claim. Therefore, it is respectfully submitted that claims 7, 14, 18 and 23 are patentable, and thus allowable, at least for the reasons set forth above.

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35 U.S.C. § 103 Rejections

In the Office Action, the Examiner rejected claims 11, 31, 33 and 34 under 35 U.S.C. § 103(a), as being unpatentable over Whitehill in view of Baral et al., US Publication Number 1004/0162070. Specifically, regarding claims 11 and 33, the Examiner contended that it was known at the time of invention to monitor and filter abnormal behavior of mobile stations in a wireless network, wherein instances of attempts to gain access to said wireless local area network are recorded (p. 1 [0008], p. 2 [0022] and p. 2 [0030]).

Furthermore, regarding claims 31 and 34, the Examiner contended that it was known at the time of the invention to exclude said client from access to said network if a known identity of said client corresponds to one or more of said instances of attempts to gain access to said network (p. 3 [0028] lines 6-10, p.3 [0035], lines 13-20, p. 4 [0038], lines 13-16 and p. 4 [0040]).

As described above, Whitehill does not teach a method of locating a client using a location fingerprint. Baral does not cure the deficiencies of Whitehill.

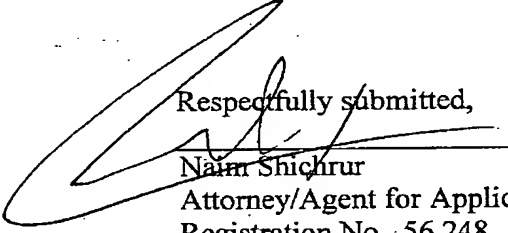
In view of the direct or indirect dependency of claims 11, 31, 33 and 34 from (amended) independent claims 1 and 32, applicant respectfully requests the rejection of claims 11, 31, 33 and 34 under 35 U.S.C. §103(a) to be withdrawn.

In view of the foregoing amendments and remarks, the pending claims are deemed to be allowable. Their favorable reconsideration and allowance is respectfully requested.

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Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Please charge any fees associated with this paper to deposit account No. 50-3355.



Respectfully submitted,

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